

REMARKS

In the non-final Office Action, the Examiner rejected claims 1-14, 16-19, and 25-33 under 35 U.S.C. § 103(a) as unpatentable over Shultz et al. (U.S. Patent Application Publication No. 2003/0061211) in view of Michalewicz et al. (U.S. Patent Application Publication No. 2002/0042789); and rejected claims 15 and 20-24 under 35 U.S.C. § 103(a) as unpatentable over Shultz et al. in view of Michalewicz et al. and Rubenczyk et al. (U.S. Patent Application Publication No. 2003/0217052).

By this Amendment, Applicants cancel claims 9-11 without prejudice or disclaimer, and amend claims 1-3, 7, 24, 27-30, 32, and 33 to improve form and expedite prosecution without acquiescing in any of the allegations made by the Examiner in the Office Action. Applicants respectfully traverse the Examiner's rejections under 35 U.S.C. § 103. Claims 1-8 and 12-33 are pending.

*REJECTION UNDER 35 U.S.C. § 103 BASED ON
SHULTZ ET AL. AND MICHALEWICZ ET AL.*

In paragraph 5 of the Office Action, the Examiner rejected pending claims 1-8, 12-14, 16-19, and 25-33 under 35 U.S.C. § 103(a) as allegedly unpatentable over Shultz et al. in view of Michalewicz et al. Applicants respectfully traverse the rejection.

Amended independent claim 1, for example, is directed to a method comprising receiving a search query that includes one or more keywords; obtaining one or more geographical identifiers; identifying an area of interest based, at least in part, on the one or more geographical identifiers, where a size of the area of interest is dynamically set based, at least in part, on the one or more keywords; identifying documents that are associated with addresses located within

the area of interest; determining ones of the identified documents that match the one or more keywords as relevant documents; grouping the relevant documents into clusters based, at least in part, on the addresses associated with the relevant documents, each of a plurality of the clusters corresponding to one of the addresses; and presenting the clusters.

Neither Shultz et al. nor Michalewicz et al., whether taken alone or in any reasonable combination, discloses or suggests the combination of features recited in amended claim 1. For example, neither Shultz et al. nor Michalewicz et al. discloses or suggests identifying an area of interest based, at least in part, on one or more geographical identifiers, where a size of the area of interest is dynamically set based, at least in part, on one or more keywords in a received search query.

With regard to claim 11 (now canceled), the Examiner alleged that Shultz et al. discloses a radius that is dynamically set based, at least in part, on one or more keywords and cited paragraph 0049 of Shultz et al. for support (Office Action, page 11). Without acquiescing in the Examiner's allegation, Applicants submit that Shultz et al. does not disclose or suggest identifying an area of interest based, at least in part, on one or more geographical identifiers, where a size of the area of interest is dynamically set based, at least in part, on one or more keywords in a received search query, as required by claim 1. Michalewicz et al. also does not disclose or suggest this feature.

At paragraph 0049, Shultz et al. discloses:

Geographic criteria primarily define the involvement of the GIS database (e.g., database 131) in filtering the search results for the information query. For example, user query 202 can be limited to those results (e.g. businesses) that are located in a defined geographic area. For example, the geographic area may be a city, country, state, country, radial distance, or geometric corridor. Geographic criteria may also include the geographic area within a specified zip code, an area code, or the area defined by a specific radius from the

location data, such as a street address, zip code, area code, state, longitudinal and latitudinal coordinates, any unified geocoding system, state planar coordinates, or combinations thereof. In addition, the search results can be limited and/or sorted to those results that are in closest proximity to the location data. For example, if the user enters or spatially designates his home street address as the location data, then he can request that the ten search results in closest proximity to his home be provided.

In this section, Shultz et al. discloses that search results can be limited to businesses that are located within a city, a state, a country, a radial distance, a geometric corridor, a specified zip code, an area code, or an area defined by a specific radius from the location data, such as a street address, zip code, area code, state, longitudinal and latitudinal coordinates, any unified geocoding system, state planar coordinates, or combinations thereof. Nowhere in this section, or elsewhere, does Shultz et al. disclose or suggest that the size of any of these geographic areas is dynamically set based, at least in part, on one or more keywords in a received search query. Instead, Shultz et al. specifically discloses a "specific radius from the location data" (paragraph 0049). Therefore, Shultz et al. does not disclose or suggest identifying an area of interest based, at least in part, on one or more geographical identifiers, where a size of the area of interest is dynamically set based, at least in part, on one or more keywords in a received search query, as required by claim 1.

For at least these reasons, Applicants submit that claim 1 is patentable over Shultz et al. and Michalewicz et al., whether taken alone or in any reasonable combination. Claims 2-8, 12-14, 16-19, 25, and 26 depend from claim 1 and are, therefore, patentable over Shultz et al. and Michalewicz et al. for at least the reasons given with regard to claim 1.

Amended independent claims 27 and 30 recite features similar to, but possibly different in scope than, features recited in claim 1. Claims 27 and 30 are, therefore, patentable over Shultz et al. and Michalewicz et al., whether taken alone or in any reasonable combination, for at

least reasons similar to reasons given with regard to claim 1. Claim 31 depends from claim 30 and is, therefore, patentable over Shultz et al. and Michalewicz et al. for at least the reasons given with regard to claim 30.

Amended independent claim 28 is directed to system that comprises a memory and a processor connected to the memory. The memory is configured to store information that matches documents to addresses associated with the documents. The processor is configured to receive a search query that includes one or more geographical identifiers, determine a geographical area of interest based, at least in part, on the one or more geographical identifiers, identify documents that are associated with addresses located within the geographical area of interest based, at least in part, on the information stored in the memory, group the identified documents into clusters based, at least in part, on the addresses associated with the identified documents, each of a plurality of the clusters corresponding to one of the addresses, assign scores to each of the clusters based, at least in part, on a distance factor and a relevancy factor, where at least one of the distance factor or the relevancy factor is weighted based, at least in part, on a specificity of the one or more geographical identifiers, and provide the clusters as search results based, at least in part, on the assigned scores.

Neither Shultz et al. nor Michalewicz et al., whether taken alone or in any reasonable combination, discloses or suggests the combination of features recited in amended claim 28. For example, neither Shultz et al. nor Michalewicz et al. discloses or suggests a processor to assign scores to each of the clusters based, at least in part, on a distance factor and a relevancy factor, where at least one of the distance factor or the relevancy factor is weighted based, at least in part, on a specificity of the one or more geographical identifiers.

With regard to claim 24, the Examiner alleged that Rubenczyk et al. discloses weighting a distance factor and a relevancy factor differently based, at least in part, on the search query and cited paragraph 0427 of Rubenczyk et al. for support (Office Action, page 24). Without acquiescing in the Examiner's allegation, Applicants submit that Shultz et al., Michalewicz et al., and Rubenczyk et al. do not disclose or suggest a processor to assign scores to each of the clusters based, at least in part, on a distance factor and a relevancy factor, where at least one of the distance factor or the relevancy factor is weighted based, at least in part, on a specificity of the one or more geographical identifiers, as required by claim 28.

At paragraph 0427, Rubenczyk et al. discloses:

The set of classifications that are available or can be made immediately available for the data items are defined by the navigation guidelines that were set up for the database. Generally, the guidelines preferably contain a collection of hierarchically structured conceptual taxonomies for domain-specific browsing. Each node in a hierarchy represents a potential class, it may have query terms associated with it and may be linked to a set of domain data items which may be ranked using weighting values. Additional navigation information includes specifications as to which classes are considered as attributes for which other classes, additional relations between concepts, relevance of different attributes, and possible attribute values, as will be explained in greater detail below.

In this section, Rubenczyk et al. discloses nodes of a hierarchy that have query terms and may be linked to a set of domain data items that may be ranked using weighting values. While this section of Rubenczyk et al. discloses "weighting values," these weighting values clearly are not associated with a distance factor or a relevancy factor that is weighted based, at least in part, on a specificity of one or more geographical identifiers. Thus, Rubenczyk et al. does not disclose or remotely suggest a processor to assign scores to each of the clusters based, at least in part, on a distance factor and a relevancy factor, where at least one of the distance factor or the relevancy factor is weighted based, at least in part, on a specificity of the one or more geographical

identifiers, as required by claim 28. Shultz et al. and Michalewicz et al. also do not disclose or suggest these features.

For at least these reasons, Applicants submit that claim 28 is patentable over Shultz et al., Michalewicz et al., and Rubencyk et al., whether taken alone or in any reasonable combination.

Amended independent claim 29 recites features similar to, but possibly different in scope than, features recited in claim 28. Claim 29 is, therefore, patentable over Shultz et al., Michalewicz et al., and Rubencyk et al., whether taken alone or in any reasonable combination, for at least reasons similar to reasons given with regard to claim 29.

Amended independent claim 32 is directed to a method comprising receiving a search query that includes one or more keywords and at least one portion of a telephone number; identifying documents that are associated with telephone numbers that match the at least one portion of the telephone number; determining ones of the identified documents that match the one or more keywords as relevant documents; grouping the relevant documents into clusters based, at least in part, on the telephone numbers included in the relevant documents; and presenting the clusters as search results.

Neither Shultz et al. nor Michalewicz et al., whether taken alone or in any reasonable combination, discloses or suggests the combination of features recited in claim 32. For example, neither Shultz et al. nor Michalewicz et al. discloses or suggests grouping the relevant documents into clusters based, at least in part, on telephone numbers included in the relevant documents.

The Examiner did not address this feature of claim 32 and, therefore, did not establish a prima facie case of obviousness with regard to claim 32. The Examiner classified this

argument as "either more limiting than the claimed language or completely irrelevant" (Office Action, page 4). Applicants submit that this allegation does not alleviate the burden that rests solely upon the Examiner to establish a prima facie case.

For at least these reasons, Applicants submit that claim 32 is patentable over Shultz et al. and Michalewicz et al., whether taken alone or in any reasonable combination.

Amended independent claim 33 recites features similar to, but possibly different in scope from, features recited in claim 32. Claim 33 is, therefore, patentable over Shultz et al. and Michalewicz et al., whether taken alone or in any reasonable combination, for at least reasons similar to reasons given with regard to claim 32.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1-8, 12-14, 16-19, and 25-33 under 35 U.S.C. § 103 based on Shultz et al. and Michalewicz et al.

*REJECTION UNDER 35 U.S.C. § 103 BASED ON
SHULTZ ET AL., MICHALEWICZ ET AL., AND RUBENCZYK ET AL.*

In paragraph 6 of the Office Action, the Examiner rejected claims 15 and 20-24 under 35 U.S.C. § 103(a) as allegedly unpatentable over Shultz et al. in view of Michalewicz et al. and Rubenczyk et al. Applicants respectfully traverse the rejection.

Claims 15 and 20-24 depend from claim 1. Without acquiescing in the Examiner's rejection with regard to claims 15 and 20-24, Applicants respectfully submit that the disclosure of Rubenczyk et al. does not cure the deficiencies in the disclosures of Shultz et al. and Michalewicz et al. identified above with regard to claim 1. Therefore, claims 15 and 20-24 are patentable over Shultz et al., Michalewicz et al., and Rubenczyk et al., whether taken alone or in

any reasonable combination, for at least the reasons given with regard to claim 1.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 15 and 20-24 under 35 U.S.C. § 103 based on Shultz et al., Michalewicz et al., and Rubenczyk et al.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants respectfully request the Examiner's reconsideration of the application and the timely allowance of the pending claims.

As Applicants' remarks with respect to the Examiner's rejections overcome the rejections, Applicants' silence as to certain assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, motivation to combine references, assertions as to dependent claims, etc.) is not a concession by Applicants that such assertions are accurate or that such requirements have been met, and Applicants reserve the right to dispute these assertions/requirements in the future.

If the Examiner believes that the application is not now in condition for allowance, Applicants respectfully request that the Examiner contact the undersigned to discuss any outstanding issues.

To the extent necessary, a petition for an extension of time under 35 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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